



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

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TH/RAB  
F. #2025R00212

271 Cadman Plaza East  
Brooklyn, New York 11201

April 9, 2025

The Honorable Kiyo A. Matsumoto  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re:     United States v. Jonathan Braun  
                Criminal Docket No. 10-433 (KAM)

Dear Judge Matsumoto:

The government respectfully submits this letter in advance of the revocation hearing scheduled for tomorrow, April 10, 2025. At the hearing, the government intends to admit testimony and evidence related to the following violations:

- Charges 1-3: On March 29, 2025, the defendant Jonathan Braun was arrested by the Nassau County Police Department in connection with his assault of an individual (“Victim-1”) and his three-year-old son (“Victim-2”). Victim-1 is not available to testify at the hearing and is traveling for the Passover holiday, but the government intends to present the testimony of an individual who was a witness to the assault. If necessary, the government may request that the Court set a future date for the testimony of Victim-1.
- Charge 4: On January 24, 2025, while at Mount Sinai South Nassau Hospital, the defendant engaged in a verbal dispute with members of hospital staff. The defendant became aggressive and combative with staff and attempted to punch a registered nurse in the emergency department (“Victim-3”) and swung an IV pole at her. The government expects that Victim-3 will testify at the hearing.
- Charge 6: On February 15, 2025, the defendant went to the bedroom of the live-in nanny he and his wife employed (“Victim-4”). The defendant held Victim-4 on her bed, groped her without her consent, and forced Victim-4 to touch his genitals. Victim-4 is prepared to testify at the hearing, but is not available to testify until Friday, April 11. The government respectfully requests that the Court permit Victim-4 to testify on April 11.

- Charge 7: Between approximately May and July 2024, the defendant, who was driving a white Lamborghini Urus and a black Ferrari, repeatedly evaded paying the tolls for the Atlantic Beach Bridge. Neither vehicle driven by the defendant had a license plate or registration. The government expects that the Executive Director of the Nassau County Bridge Authority will testify regarding Charge 7. The toll collector (the “Toll Collector”) who identified the defendant as the driver of the vehicles is not available to testify tomorrow, but the government expects to admit the photo identification made to the Nassau County Police Department.

The government respectfully requests that given the nature of the sexual misconduct charges, Victim-4 be permitted to testify using her middle name only, and that the shared last name of Victim-1 and Victim-2 not be used in open court because doing so would tend to identify Victim-2, who is a minor child. Defense counsel does not object to this request. For the same reasons, the government respectfully requests leave to file its witness list, which identifies the true name of Victim-4, under seal.

The government intends to admit the following exhibits at the hearing:

GX1	Surveillance Video of Atlantic Beach Bridge
GX2	Toll Evader Observation Sheet
GX3	Toll Collector Supporting Deposition
GX4	Toll Collector Written Deposition
GX5	Photo Array
GX6A-G	Vehicle Photographs
GX7	Body Worn Camera Footage Dated February 15, 2025
GX8	Still Image from GX7
GX9	Text Messages between Victim-4 and Third Party
GX10	Text Messages between Victim-4 and Third Party
GX11	Text Messages between Victim-4 and Third Party

To the extent the defendant objects to the admission of the government's exhibits, the government respectfully seeks leave to address the admissibility of the exhibits in a post-hearing brief.

Respectfully submitted,

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United States Attorney

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U.S. Probation Officer Heather Clark (by email)